Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 90 of the Commission's Rules to Improve Access to Private Land Mobile Radio Spectrum	)	WP Docket No. 16-261
	)	
Land Mobile Communications Council Petition for Rulemaking Regarding Interim Eligibility for 800 MHz Expansion Band and Guard Band Frequencies	)	RM-11719
	)	
Petition for Rulemaking Regarding Conditional Licensing Authority	)	RM-11722
	)	

To: The Commission

REPLY COMMENTS OF CSAA

The Central Station Alarm Association and its related Alarm Industry Communications Committee (collectively "CSAA") hereby submit, pursuant to Section 1.415(c) of the Commission's Rules, these reply comments on the Commission's *Notice of Proposed Rulemaking* (NPRM) in the above-referenced docket. CSAA continues to support those initiatives of the NPRM that have been proposed in petitions for rulemaking filed by the Land Mobile Communications Council (LMCC), of which CSAA is a member, through its participation in LMCC's concurrently filed reply comments. With regard to the NPRM's proposal to remove the central station channel restriction from certain non-nationwide UHF frequencies, CSAA has shown that alarm service providers have a continuing and significant need for the Low Power Pool Group D frequencies that have been allocated for central station alarm signaling operations. No commenters have refuted this showing, or demonstrated a need

for the Group D frequencies beyond the availability of the 467 other Low Power Pool frequencies. With regard to the higher powered central station voice channels discussed in the NPRM, CSAA has worked with the Land Mobile Communications Council (LMCC) to modify the alternative proposal contained in CSAA's November 22, 2016 Comments;[1] and LMCC has adopted this modified proposal as a consensus plan recommended to the Commission by all of the relevant frequency coordinators. This consensus plan will significantly increase use of the central station voice frequencies by making most of them available for non-central station use pursuant to a mutually agreeable frequency coordination protocol, while safeguarding the ability of alarm service providers to send communications directly related to saving lives and property. The record in this proceeding supports adoption of the consensus plan attached hereto and to the LMCC Reply Comments.

The Record Demonstrates that the Low Power Pool Group D Frequencies Must Remain Restricted for Central Station Use

CSAA's November 22, 2016 Comments in this proceeding have established that the alarm industry is heavily using the Low Power Pool Group D central station offset frequencies to protect the safety of life and property, and that a number of factors show that this usage will increase substantially in the near future.[2] In particular, CSAA's Comments demonstrated that:

- Central station alarm operations protect tens of millions of families in their homes; and they protect a wide range of sensitive facilities from fire, burglaries, sabotage and other emergencies, including government facilities, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, schools/universities, and other critical facilities that could become the target of terrorist attacks as well as other life threatening events. Every alarm message sent over one of these frequencies indicates the detection of a fire, home invasion, excess carbon monoxide, or other condition that can threaten the safety of life and property.[3]

[1] *See* Comments of CSAA filed November 22, 2016 at 10 – 14.
[2] *Id.* at 4 – 7.
[3] *Id.* at 2.

- The central stations in turn screen any alarms received, and alert the relevant public safety entities so that they can send the appropriate first responders.[4]

- The use of alarm systems is on the rise, as persons and businesses are becoming more security conscious, and more prone to using smart home or business technology.[5]

- The use of wireless devices to relay alarm signals of all types to the central station is also significantly on the rise, based on information provided by one of the manufacturers of central station frequency equipment (27.92 percent growth in 2015 for fire detection radios) and the Alarm Industry Communications Committee 2016 Member Survey (use of wireless alarm devices has increased to approximately 57 percent in 2016, and is expected to rise further).[6]

- In light of more frequent shifts in technology by the cellular industry (i.e., from 2G to 3G to 4G LTE to 5G), several alarm companies are finding that it is necessary to use the dedicated central station channels allocated under Rule Section 90.35(c) to avoid recurring truck rolls to replace customer premise radios.[7]

- The rapid transition away from traditional telephone line technology means that approximately 58 percent of existing alarm connections (i.e., approximately 23 million alarm systems) must be converted to another medium over the next 7 to 10 years; and a significant number of these systems will be converted to a wireless connection, with many using the dedicated central station frequencies.[8]

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[4] *Id.*
[5] *Id.* at 3.
[6] *Id.* at 3 – 4.
[7] *Id.* at 4 – 6.
[8] *Id.* at 6 – 7.

- CSAA has provided the Declaration of Owais Hassan, Vice President of Engineering for AES Corp., establishing that alarm signaling and other types of PLMR communications are inherently incompatible with each other, and can be expected to suffer interference if the central station restriction is eliminated. Such interference can introduce significant delays into the transmission of alarm signals on the same or adjacent channels, thereby jeopardizing life and property.[9]

No facts have been introduced into the record contradicting CSAA's above showings. These facts indicate that the Commission must not disturb the allocation of a handful of Low Power Pool channels for alarm signaling.

The Commission Should Adopt the Consensus Plan that has been Approved by LMCC and All of the Relevant Frequency Coordinators

CSAA's Comments also showed that the need for central station voice channels is still present and likely to grow.[10] The central station primary channels can be used for activities such as dispatching armed guard responses to emergencies, communicating with security patrols, coordinating restoration of service during disasters, and other functions requiring the ability to communicate with personnel in the field – all of which are important safety communications.[11] Moreover, if the Commission removes the severe restrictions on data contained in Rule Section 90.35(c)(64), alarm companies can use the primary channels for alarm signaling, in those markets where the low power channels are becoming fully occupied.[12]

To the extent that any of the central station channels are not at present heavily utilized, it would be the voice channels, since some alarm companies have in recent years elected to use cellular devices for voice communications.[13] While there is still a need for higher powered dedicated central station frequencies, CSAA in its November 22 Comments presented a good faith proposal to make a portion of these channels available for non-central station operations,

[9] *Id.* at 14 – 15. *See also* Attachment C.
[10] *Id.* at 7.
[11] *Id.*
[12] *Id.* at 12.
[13] *Id.* at 13.

pursuant to a protocol designed to minimize any adverse impact on alarm operations.[14] Since the filing of its Comments, CSAA has consulted with other frequency coordinators, revised its proposed protocol, and presented it to LMCC for formal consideration. At its December 8, 2016 meeting, LMCC voted to approve the CSAA protocol, with certain revisions that have been incorporated; and LMCC has included this protocol with a recommendation for Commission adoption, in its simultaneously-filed Reply Comments. The final version is also attached hereto as Exhibit A.

The proposed protocol creates access by non-central station operations to up to eight of the ten voice frequencies allocated for central station use. The last available voice pair in any given area would be reserved for central station operations. This protocol would apply regardless of whether there are existing central station operations in the area, and in that regard goes even further than the NPRM's primary focus on urbanized areas where there are no central station incumbents. Thus, CSAA has addressed the wishes voiced by commenters Mobile Relay Associates and MRFAC that availability of this spectrum as proposed by the Commission would help address channel congestion (and indeed, MRFAC has concurred in the LMCC consensus adopting CSAA's protocol).

Accordingly, CSAA and its related Alarm Industry Communications Committee (AICC) have engaged in an industry-wide assessment of future central station spectrum needs, as requested by the NPRM. AICC is comprised of CSAA, Electronic Security Association (ESA), Security Industry Association (SIA), the National Public Safety Telecommunications Council (NPSTC), Ackerman Security, ADS, ADT, AES-IntelliNet, AFA Protective Systems, Alarm.com, Alarm Detection Systems, ASG Security, Axis Communications, Bay Alarm, Bosch Security Systems, Charter Communications, Comcast, COPS Monitoring, CRN Wireless, LLC, DGA Security, Digital Monitoring Products, Digital Security Control, Encore Networks, FM Approvals, Honeywell Security, Inovonics, Interlogix, Intertek Testing, iPDatatel, MONI, Napco Security, NetOne, Nortek, Protection One, Rapid Response Monitoring, Security Central NC, Select Security/Security Partners, Simplex Grinnell, Stanley Security, Supreme Security Systems, Inc., Telular Corp, Tyco Integrated Security, Tyco Security Products, Underwriters

[14] *Id.* at 11 – 12.

Laboratories (UL), Universal Atlantic Systems, Vector Security, Inc., Vivint (formerly APX Alarm), and Wayne Alarm. Thus, every aspect of the alarm industry is well represented in AICC, including central stations, equipment manufacturers, alarm service dealers, and the Public Safety community. CSAA has used this assembled expertise to craft a protocol that is designed to protect the existing and future ability of alarm service providers to send vital life safety communications and to work with public safety entities in safeguarding members of the public. CSAA then obtained the input of LMCC, and achieved a consensus with all of the relevant FCC-designated frequency coordinators.[15] The Commission should give this joint effort great weight, and adopt the LMCC consensus plan, including the recommendation that LMCC and CSAA work together to develop details of the protection requirements for incumbents, etc. (similar to the approach taken in PS Docket No. 13-229 for creation of a coordination protocol for 173 MHz band vehicular repeaters).

Conclusion

As shown above, there is no justification for removing the central station restriction from any of the Group D Low Power Pool channels; and industry and regulatory developments are creating the need for more dedicated central station spectrum in the immediate future. With regard to the higher powered 90.35(c)(63) primary central station channels, the Commission should remove the data restrictions on these channels, and adopt the industry-crafted consensus plan reflected in Exhibit A.

[15] As noted in LMCC's Reply Comments, certain public safety coordinators abstained from the vote on the protocol, since it did not concern spectrum specifically allocated to the Public Safety Pool.

Respectfully submitted,

CENTRAL STATION ALARM ASSOCIATION

ALARM INDUSTRY COMMUNICATIONS COMMITTEE

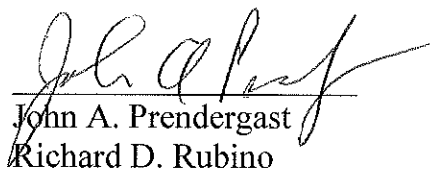
By: 

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EXHIBIT A

CSAA Proposal for Central Station Channels

Nationwide Channels

- The nationwide central station voice channels and associated 12.5 kHz offset channels (footnote 27 in the NPRM) would remain assigned for central station use.
- The LMCC would support allowing primary data use on the five central station voice channels (three urbanized and two nationwide pairs).
- CSAA would consider concurring with waiver requests to utilize the central station voice channels based on a showing that there are no exclusive use (FB8) frequencies available in the applicant's primary pool.

Urban Channels

- The urban central station voice channels (460.900, 465.900, 460.925, 465.925, 460.950 and 465.950 MHz) would be available for all Part 90 applicants proposing FB8 operations. Mobile-only operations will not be allowed by non-central stations. Applicants shall seek concurrence from CSAA for use of these channels for the purpose of ensuring that incumbent central station alarm operations will be protected from interference in accordance with the FCC's rules and protocols that are developed as part of an LMCC consensus plan for this spectrum. It is contemplated that the protection protocol will be similar to the consensus plan adopted for the 173 MHz band, such that applicants will demonstrate that the proposed 21 dbuVm interference contour will not overlap the incumbent central station licensee's area of operation, as reflected on its license.

- Incumbent central station systems could be licensed for primary voice and/or data as FB8 with a protected service area defined by the LMCC even if operating in conventional mode.
- Non-central station systems will be subject to the requirements of FCC Rule Section 90.187 with regard to co-channel non-central station licenses.

Last Available Voice Channel

In order to ensure the availability of at least one higher powered voice/data frequencies for future central station operations, CSAA will not be required to concur in, and other frequency coordinators shall not coordinate, an application for a central station urban channel (or a central station nationwide channel with a waiver request) if it would utilize the last available central station voice channel pair within a 75-mile radius of the center coordinates (as specified in FCC Rule Section 90.741) of the urbanized area(s) defined in FCC Rule Section 90.35(c)(63).

Low-power Group D Channels

All of the 12.5 kHz and 6.25 kHz low-power Group D Channels would remain assigned for central station use only, as currently designated by Rule Sections 90.35(c)(63), (65), (66), (83) and (87), as applicable and Rule Section 90.267(f)(5), except that central station alarm signaling on these frequencies will be co-primary to with regard to co-channel or adjacent channel base, mobile or data operations. Voice operations will not be allowed on any of the Group D Channels.